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File

STATE OF MISSOURI

Mel Camahan, Governor • David A. Shorr, Director

DEPARTMENT OF NATURAL RESOURCES

- DIVISION OF ENVIRONMENTAL QUALITY -P.O. Box 176 Jefferson City, MO 65102-0176

November 9, 1993

Mr. Joe Haake
McDonnell Douglas Aerospace
Environmental and Hazardous
Materials Services
Mail Code 1003377
St. Louis, MO 63166-0516

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PRMT-SECTION

Dear Mr. Haake:

In a letter dated July 28, 1993, you provided information regarding closure activities at the Tract I facility, RCRA permit # 0S0 062284 002. The Missouri Department of Natural Resources (MDNR) would like to provide the following comments.

Enclosure 1 of your letter is a report justifying the current groundwater remediation activity at the Tract I facility. Groundwater remediation is on-going in the vicinity of the former locations of the Hush House Waste Tank, the Ramp Station 1 and 2 Waste Tank and Fuel Pits # 3 and # 4. The Hazardous Waste Program finds that the current groundwater remediation efforts are acceptable. For the purpose of the RCRA permit, these areas will not be considered closed until we receive a closure certification verifying that the cleanup levels specified in MDNR's May 27, 1993 letter to McDonnell Douglas have been achieved.

Enclosure 2 of your letter is the closure certification for the original Area 2 container storage building. MDNR previously reviewed a photocopy of this document. The photocopy did not reveal the professional engineer's seal. Enclosure 2 of your letter shows that the original document was stamped by a registered professional engineer. The original Area 2 container storage building is considered closed and is no longer part of the RCRA permit.

The Area 2 container storage building was replaced by a prefabricated safety storage building. Operation of the new Area 2 container storage building is subject to the conditions of the RCRA permit.



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Enclosure 3 of your letter is the sampling plan for closure of Tanks H12-H16, Tanks H19 and H20, the Building 28 Waste Tank and the Area 3 container storage building. The sampling plan for Tanks H12-H16 should include a sample location in front of the drain. The samples need to be analyzed for total concentration of heavy metals, rather than TCLP.

McDonnell Douglas has provided acceptable closure certifications for the F-18 Silencer Waste Tank and the Building # 6 Waste Oil Tank. These tank systems are considered closed and are no longer part of the RCRA permit.

If you have any questions about this letter or your RCRA permit, please contact Mr. Steve Jaques at (314) 751-3176.

Sincerely,

HAZARDOUS WASTE PROGRAM

Ed Sadler Director

ES:sjs

c: Bob Stewart, P.E., U.S. EPA Region VII St. Louis Regional Office

